

REMARKS/ARGUMENTS

Favorable reconsideration of this application, as presently amended and in light of the following discussion is respectfully requested.

Claims 1-9 are currently pending in the application. Claims 1, 5 and 6 are amended by the present amendment. Support for amended independent Claims 1, 5 and 6 can be found in the original specification, claims and drawings. No new matter is presented.

In the outstanding Official Action, Claims 1, 3-7 and 9 were rejected under 35 U.S.C. 102(b) as being anticipated by Sakellariadis (Spyros Sakellariadis, "Using Exchange Server with SMTP and POP3", June 1998); and Claims 2 and 8 were rejected under 35 U.S.C. § 103(a) as unpatentable over Sakellariadis in view of Leeds (Leeds, U.S. Pub. 20020016824 A1).

In response to the rejection based on Sakellariadis, Applicant respectfully submits that amended independent Claims 1, 5 and 6 state novel features clearly not taught or rendered obvious by the applied references.

Independent Claims 1, 5 and 6 are directed to an electronic messaging system capable of send electronic messages of various formats. A message sent by a first client contains meta information and message content, and the meta data is extracted by a first message gateway and forwarded to a message broker that selects an appropriate second message gateway corresponding to the second (e.g., receiving) client. This selection is carried out by the message broker on the basis of said meta information and the profile data *of the target client* managed by the message broker.

The profile data *of the target client* is also taken into consideration by the message broker when the message broker determines a message conversion *of the message content* to be applied to the message content before it is sent to the second message gateway and the second client.

Specifically, amended independent Claim 1 recites, *inter alia*, a method for transmitting messages in a distributed system, the method comprising:

...selecting, by the message broker, a second message gateway and a message conversion of the message content on the basis of the meta information and profile data of the target client managed by the message broker...

Amended independent Claims 5 and 6, while directed to alternative embodiments, recite substantially similar features. Accordingly, the arguments presented below are also applicable to these claims.

In Sakellariadis, a first message gateway (Hermes) contacts a message broker (DNS server) to find out where to forward a message received from a sending client (Patmos). The message sent by the sending client (Patmos) to the first message gateway (Hermes) comprises a message data and an email address of the target client (MarkPC) that should receive the message. This email address (e.g. Mark@Minasi.com) is then extracted from the message by the first message gateway. After this extraction of the entire email address, the DNS server is used by the first message gateway to determine the IP address of a second message gateway (Arlington) that is responsible for forwarding the email to the target client defined by the address Mark@Minasi.com.

The address Mark@Minasi.com consists of a user name "Mark" and a domain name "Minasi.com," and only the domain name is used as a search key for searching the IP address of a second message gateway in the database of the DNS server that is called the "DNS records database." Thus, the DNS server sends the IP address of the second message gateway to the first message gateway on the basis of the domain name of the target email address.

The outstanding Official Action asserts that the DNS records, which comprise a list of domain names and respective IP addresses, are client profile data on the basis of which a second method gateway is selected.

However, the DNS records described in Sakellariadis are not *client profile data* but are instead *domain name profile data*.

Amended independent Claim 1 recites that the second message gateway is selected according to a *profile* of the receiver or *target client*. In contrast, Sakellariadis describes selecting a second message gateway on the basis of DNS records that are valid for all target clients within the given domain name.

Therefore, according to Sakellariadis, it is not possible for the target client to specify a desired second message gateway in a client profile. Instead, the DNS records of the DNS server inform the first message gateway that messages are to be delivered to a given second message gateway for each client in the domain name, such that there is no possibility for a target client within this domain name to specify another desired second message gateway.

Accordingly, Sakellariadis fails to teach or suggest *selecting, by the message broker, a second message gateway... on the basis of ... profile data of the target client managed by the message broker*, as recited in amended independent Claim 1.

Further, amended independent Claim 1 recites *selecting, by the message broker, a ... a message conversion of the message content...*

In addressing this feature, the official Action asserts the “selected [DNS] record of a second message gateway will be used to convert the message to include IP address of the gateway.”¹

However, as recited in the pending claims, a message includes two separate parts, **meta information** and **message content**. While the meta information comprises the address

¹ Outstanding Official Action, p. 4.

of the target sender, the message content represents the information sent by the sending client to the target client.²

As noted in the outstanding Official Action, Sakellariadis describes modifying the meta information of the message by adding the IP address of the second message gateway.

However, as noted above, amended independent Claim 1 recites converting *the message content*. As described in an exemplary embodiment at p. 4, lines 19-20 of the specification, “[a]t least one message processor can process particularly the content of transmitted message.” Further, p. 5, lines 10-11 of the specification describes that “[i]n case... a message conversion is required, the instant message can be routed over an additional message processor. ”

Accordingly, Sakellariadis fails to teach or suggest *selecting, by the message broker, ...a message conversion of the message content*, as recited in amended independent Claim 1.

Accordingly, Applicants respectfully request that the rejection of Claim 1 under 35 U.S.C. § 102(b) be withdrawn. For substantially similar reasons provided above with respect to amended independent Claim 1, it is also submitted that independent Claims 5 and 6, as amended, patentably define over Sakellariadis.

Claims 2 and 8 were rejected 35 U.S.C. § 103(a) as unpatentable over Sakellariadis. However, as discussed above, Sakellariadis fails to teach or suggest the above-noted features recited in amended independent Claims 1 and 6. Likewise, Leeds fails to remedy this deficiency, and therefore, none of the cited references, neither alone nor in combination, teach or suggest Applicant’s Claims 2 and 8 which includes the above distinguished features by virtue of dependency. Therefore, the applied references do not provide a *prima facie* case of obviousness with regard to any of these claims.

² e.g., specification, p. 5, line 9.

Accordingly, Applicant respectfully requests the rejection of Claims 2 and 8 under 35 U.S.C. § 103 be withdrawn.

Consequently, in view of the present amendment and in light of the foregoing comments, it is respectfully submitted that the invention defined by Claims 1-9 is definite and patentably distinguishing over the applied references. The present application is therefore believed to be in condition for formal allowance and an early and favorable reconsideration of the application is therefore requested.

Respectfully submitted,

OBLON, SPIVAK, McCLELLAND,
MAIER & NEUSTADT, P.C.

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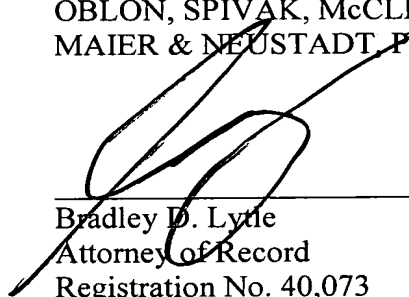
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Tel: (703) 413-3000

Fax: (703) 413 -2220

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Bradley D. Lytle
Attorney of Record
Registration No. 40,073

Andrew T. Harry
Registration No. 56,959